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7 **UNITED STATES DISTRICT COURT**

8

DISTRICT OF NEVADA

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10 Theresa Stone, Carter Sullivan and Edalia
Sullivan, individually and on behalf of all
others similarly situated,

11

Plaintiffs,

12

v.

13

14 Equifax Information Services LLC, Trans
Union LLC, and Experian Information
Solutions, Inc.

15

Defendants.

Case No. 2:24-CV-00195-GMN-EJY

**STIPULATION FOR EXTENSION OF
TIME FOR DEFENDANT TRANS UNION
LLC TO FILE ITS RESPONSIVE
PLEADING TO PLAINTIFFS' FIRST
AMENDED COMPLAINT**

[FIRST REQUEST]

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17 Defendant Trans Union LLC (“Trans Union”) and Plaintiffs Theresa Stone, Carter Sullivan
and Edalia Sullivan (collectively “Plaintiffs”), by and through their undersigned counsel, hereby
18 stipulate and agree to extend the time for Trans Union to respond to Plaintiffs’ First Amended
19 Complaint by twenty-eight (28) days from the current deadline of June 5, 2025, up to and including
20 July 3, 2025. This request is submitted pursuant to LR IA 6-1 and LR IA 6-2 and is Trans Union’s
21 first request for an extension of time for Trans Union to respond to Plaintiffs’ First Amended
22 Complaint.
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25 On May 9, 2025, Plaintiffs filed a First Amended Complaint naming Trans Union as an
additional party. (ECF No. 62). On May 15, 2025, Trans Union was served with a Summons and the
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1 First Amended Complaint. (ECF No. 72). Pursuant to Rule 12(a)(1)(A)(i) of the Federal Rules of
 2 Civil Procedure, Trans Union's deadline to respond to the First Amended Complaint is June 5, 2025.

3 Good cause exists for this extension. Counsel for Trans Union was only recently retained and
 4 requires additional time to conduct its investigation into the allegations in the First Amended
 5 Complaint, by which Plaintiffs assert class claims against Trans Union, and research the relevant law
 6 in order to prepare an appropriate response to the First Amended Complaint.
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8 Plaintiffs' counsel has courteously agreed to this extension of time for Trans Union to file its
 9 responsive pleading. This Stipulation was prepared by counsel for Trans Union with the consent of
 10 Plaintiffs and is made in good faith and not for purposes of delay. Accordingly, Trans Union shall
 11 have up to and including July 3, 2025, to response to Plaintiffs' First Amended Complaint.
 12

13 **IT IS SO STIPULATED**

14 Dated: June 3, 2025

15 **FREEDOM LAW FIRM**

16 s/ George Haines

17 George Haines, Esq.
 18 Gerardo Avalos, Esq.
 19 8985 S. Eastern Ave., Suite 100
 Las Vegas, NV 89123
 20 *Counsel for Plaintiffs, individually and on
 behalf of all others similarly situated*

SKANE MILLS LLP

s/ Sarai L. Brown

Sarai L. Brown, Esq.
 1120 Town Center Drive, Suite 200
 Las Vegas, NV 89144
Counsel for Defendant Trans Union LLC

21 **ORDER**

22 **IT IS SO ORDERED.**

23 Dated this 4th day of June, 2025.

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 25 
 26 United States Magistrate Judge
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